

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

BARON J. LITTLETON,

Debtor.

Case No. 20-52525

Chapter 13

Hon. Thomas J. Tucker

DEBTOR'S PROPOSED PLAN MODIFICATION

NOW COMES the Debtor, **BARON J. LITTLETON**, by and through his undersigned counsel, and in support of this proposed plan modification state as follows:

1. Debtors filed for Chapter 13 bankruptcy protection on **December 22, 2020**.
2. Debtors' Chapter 13 plan was confirmed by order of this court on **March 31, 2021**.
3. Debtors request the following modification to their Chapter 13 plan:
 - a. **The Debtor's plan shall be extended to 55 months.**
4. This proposed modification is necessary due the following factors:
 - a. Debtor's tax debt for 2018 was higher than anticipated and Debtor needs to extend his plan to restore feasibility.
5. Per this plan modification, the general unsecured creditors will receive at least the amount they are entitled to receive pursuant to the Debtor's liquidation analysis.
6. Debtor filed an amended I/J simultaneously with this plan modification to reflect current income/expenses.
7. This proposed modification is necessary because the Debtors' circumstances have changed since the plan was confirmed.
8. The proposed modification has the following impact on the classes of creditors being paid by the Trustee as follows:
 - a. Class 1 creditors shall be unaffected by this proposed modification.
 - b. Class 2 creditors shall be unaffected by this proposed modification.

- c. Class 3 creditors shall be unaffected as there are no such claims in Debtor's plan.
- d. Class 4 creditors shall be unaffected by this proposed modification.
- e. Class 5 creditors shall be unaffected by this proposed modification.
- f. Class 6 creditors shall be unaffected as there are no such claims in Debtor's plan.
- g. Class 7 creditors shall be unaffected as there are no remaining claims in Debtor's plan.
- h. Class 8 creditors shall be unaffected as there are no such claims in Debtor's plan.
- i. Class 9 creditors shall receive at least the amount they are entitled to receive pursuant to the Debtor's liquidation analysis.

WHEREFORE, Debtor respectfully requests this honorable Court to grant this proposed modification.

Respectfully submitted,

Dated: 7/11/2022

/s/ Heather D. McGivern

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